

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2020 AUG 19 PM 1:10

UNITED STATES OF AMERICA

NO.

DEPUTY CLERK

v.

**3-20CR0380-B**

JASON SHEROD BALDWIN

**INDICTMENT**

The Grand Jury charges:

Count One

Advertising for Child Pornography  
(Violation of 18 U.S.C. §§ 2251(d)(1))

From on or about from on or about March 11, 2019, and continuing through on or about August 30, 2019, in the Northern District of Texas and elsewhere, **Jason Sherod Baldwin**, the defendant knowingly made, printed, and published, and caused to be made, printed, and published, notices and advertisements seeking and offering to receive and produce visual depictions, the production of which visual depictions involved the use of a person whom the defendant believed to be a minor engaging in sexually explicit conduct and which visual depictions would be of such conduct, and such notices and advertisements were transported using a means and facility of interstate commerce, that is, the defendant utilized an Apple iPhone X cellular telephone, a third-party messaging application, and the Internet to send notices seeking or advertising for child pornography as defined in 18 U.S.C. § 2256.

In violation of 18 U.S.C. §§ 2251(d)(1).

Count Two  
Advertising for Child Pornography  
(Violation of 18 U.S.C. §§ 2251(d)(1))

From on or about from on or about November 16, 2018, and continuing through on or about June 16, 2020, in the Northern District of Texas and elsewhere, **Jason Sherod Baldwin**, the defendant knowingly made, printed, and published, and caused to be made, printed, and published, notices and advertisements seeking and offering to receive and produce visual depictions, the production of which visual depictions involved the use of a person whom the defendant believed to be a minor engaging in sexually explicit conduct and which visual depictions would be of such conduct, and such notices and advertisements were transported using a means and facility of interstate commerce, that is, the defendant utilized an Apple iPhone X cellular telephone, a third-party messaging application, and the Internet to send notices seeking or advertising for child pornography as defined in 18 U.S.C. § 2256.

In violation of 18 U.S.C. §§ 2251(d)(1).

Count Three  
Advertising for Child Pornography  
(Violation of 18 U.S.C. §§ 2251(d)(1))

From on or about from on or about November 12, 2018, and continuing through on or about February 14, 2020, in the Northern District of Texas and elsewhere, **Jason Sherod Baldwin**, the defendant knowingly made, printed, and published, and caused to be made, printed, and published, notices and advertisements seeking and offering to receive and produce visual depictions, the production of which visual depictions involved the use of a person whom the defendant believed to be a minor engaging in sexually explicit conduct and which visual depictions would be of such conduct, and such notices and advertisements were transported using a means and facility of interstate commerce, that is, the defendant utilized an Apple iPhone X cellular telephone, a third-party messaging application, and the Internet to send notices seeking or advertising for child pornography as defined in 18 U.S.C. § 2256.

In violation of 18 U.S.C. §§ 2251(d)(1).

Count Four  
Advertising for Child Pornography  
(Violation of 18 U.S.C. §§ 2251(d)(1))

From on or about from on or about December 2, 2018, and continuing through on or about March 24, 2019, in the Northern District of Texas and elsewhere, **Jason Sherod Baldwin**, the defendant knowingly made, printed, and published, and caused to be made, printed, and published, notices and advertisements seeking and offering to receive and produce visual depictions, the production of which visual depictions involved the use of a person whom the defendant believed to be a minor engaging in sexually explicit conduct and which visual depictions would be of such conduct, and such notices and advertisements were transported using a means and facility of interstate commerce, that is, the defendant utilized an Apple iPhone X cellular telephone, a third-party messaging application, and the Internet to send notices seeking or advertising for child pornography as defined in 18 U.S.C. § 2256.

In violation of 18 U.S.C. §§ 2251(d)(1).

Count Five  
Receipt of Child Pornography  
(Violation of 18 U.S.C. § 2252A(a)(2)(A))

On or about October 29, 2019, and continuing through on or about December 18, 2019, in the Northern District of Texas and elsewhere, the defendant, **Jason Sherod Baldwin**, did knowingly receive material that contained child pornography that was shipped and transported in interstate commerce, and in and affecting interstate commerce by any means, including by computer, and he knew the material he received contained child pornography. Specifically, **Baldwin**, using his Apple iPhone X cellular telephone, a third-party messaging application, and the Internet to receive videos of minors engaged in sexually explicit conduct and the lewd and lascivious exhibition of the genitals of minors as defined in 18 U.S.C. § 2256, including the following video file:

<b>File Name:</b>	<b>Description:</b>
Freaky Lucas and Friends.mp4	This video files depicts a minor male in various scenes involving full nudity/undresses to full nudity where his genitals are exposed in a lewd and lascivious manner. The video transitions to the same nude minor male as he inserts a pen into is anus and exposes his anus and genitals in a lewd and luscious manner. As the video continues, two different nude minor males are depicted who are masturbating and then fondle one another. Lastly, the video returns to depict the original nude minor male who is lying on his back on a bed. The minor male penetrates his own mouth with his erect penis and then masturbates.

In violation of 18 U.S.C. § 2252A(a)(2)(A).



Count Six  
Receipt of Child Pornography  
(Violation of 18 U.S.C. § 2252A(a)(2)(A))

On or about October 29, 2019, and continuing through on or about November 11, 2019, in the Northern District of Texas and elsewhere, the defendant, **Jason Sherod Baldwin**, did knowingly receive material that contained child pornography that was shipped and transported in interstate commerce, and in and affecting interstate commerce by any means, including by computer, and he knew the material he received contained child pornography. Specifically, **Baldwin**, using his Apple iPhone X cellular telephone, a third-party messaging application, and the Internet, to receive videos of minors engaged in sexually explicit conduct and the lewd and lascivious exhibition of the genitals of minors as defined in 18 U.S.C. § 2256, including the following video file:

<b>File Name:</b>	<b>Description:</b>
2 boysuck.mp4	This video files depicts two minor males with one male who is standing and wearing only a white robe and the other is wearing a red shirt. The minor male in the red shirt is on his knees in front of the other male. The erect penis of one minor male is penetrating the mouth of the other minor male.

In violation of 18 U.S.C. § 2252A(a)(2)(A).

Forfeiture Notice  
(18 U.S.C. § 2253)

Upon conviction of any offense alleged in Counts One through Six and pursuant to 18 U.S.C. § 2253(a), the defendant, **Jason Sherod Baldwin**, shall forfeit to the United States of America (a) any visual depiction described in 18 U.S.C. §§ 2251, 2252A, and 2252 and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property.

The above-referenced property subject to forfeiture from the previously-mentioned defendant includes, but is not limited to, any interest in the following:

1. Apple iPhone X, Model A1865, bearing serial number F2LX351KJCLF and IMEI 354842095310931;
2. Apple iPhone 11 Pro, Model A2160, bearing serial number C39C29GJN6XM and IMEI 353239108449652; and
3. a child size sexual device.

A TRUE BILL:



FOREPERSON

ERIN NEALY COX  
UNITED STATES ATTORNEY



NICOLE DANA  
Assistant United States Attorney  
Texas State Bar No. 24062268  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

JASON SHEROD BALDWIN

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INDICTMENT

(Violation of 18 U.S.C. §§ 2251(d) (1))  
Advertising for Child Pornography  
(Count 1, 2, 3, and 4)

(Violation of 18 U.S.C. § 2252A (a) (2) (A))  
Receipt of Child Pornography  
(Count 5 and 6)

(18 U.S.C. § 2253)  
Forfeiture Notice

6 Counts

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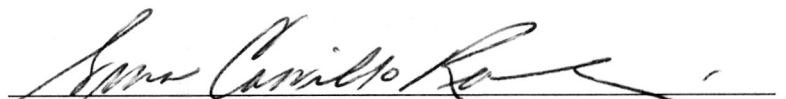
A true bill rendered

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DALLAS

FOREPERSON

Filed in open court this 19 day of August, 2020.

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**Warrant to be Issued**

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UNITED STATES MAGISTRATE JUDGE  
No Criminal Matter Pending